

REMARKS/ARGUMENTS

The Examiner is thanked for the Official Action dated June 19, 2004. This request for reconsideration is intended to be fully responsive thereto.

Claims 1-16 were rejected under 35 U.S.C. 102(b) as being anticipated by Aikawa et al. (USPN 5,563,682). The applicant respectfully disagrees.

Anticipation under Section 102 requires that a prior art reference disclose every claim element of the claimed invention. *E.g., Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 806 F.2d 1565, 1574, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986). The absence of any element of the claim from the cited reference negates anticipation. *E.g., Structural Rubber Prods. Co. v. Park Rubber Co.*, 749 F.2d 707, 715, 223 U.S.P.Q. 1264 (Fed. Cir. 1984).

Regarding claim 1: Aikawa fails to disclose a first table and a second table **each** including a light-transmissible plate to which a mask is previously mounted.

Contrary to the Examiner's allegation, the apparatus of Aikawa comprises a single transparent frame plate 7 independent of the transferring tables 12 and 13 (see Fig. 3). In other words, none of the transferring tables 12 and 13 includes a transparent plate.

Moreover, the Examiner alleges that in the apparatus of Aikawa the mask M is mounted to the transparent frame plate 7 and cites column 8, line 49 of the '682 patent to Aikawa. However, the passage cited by Examiner simply states that "The alignment stage A comprises an alignment table 2 to be utilized in a work alignment process, a retaining mechanism 5 for retaining a mask film M, provided above the alignment table 2, an image-taking means 6 for taking images of locating marks of the work W and a mask film M, and others." Obviously,

Aikawa does not teach the mask M mounted to the transparent frame plate 7. Opposite to the Examiner's allegation, in the apparatus of Aikawa, the mask film M is mounted on the work W that, in turn, is mounted to the lower frame plate 3, 4 (see Figs. 2, 4(a)-4(c), 6, 10; column 7, lines 1-13 and column 12, lines 19-23).

In the event that the Examiner maintains this rejection of claim 1 in a future written communication, the Applicant kindly requests the Examiner to point to a specific place (column, line) in the '682 patent where Aikawa discloses the recited first and second tables each including the light-transmissible plate and to which the mask is previously mounted.

Therefore, the rejection of claim 1 under 35 U.S.C. 103(a) is improper.

Regarding claim 3: in addition to the above arguments regarding the rejection of claim 1, Aikawa fails to disclose the light-transmissible plate including a plate member to which the mask is set. Contrary to the Examiner's allegation, Aikawa discloses the mask film M mounted on the work W that, in turn, is mounted to the lower frame plate 3, 4. Moreover, fails to disclose a positioning protrusion extending from a front plate-support member.

Regarding claim 4: in addition to the above arguments regarding the rejection of claim 1, Aikawa fails to disclose an abutting member provided in the load/unload position to move toward and away from the positioning protrusion of the light-transmissible plate, and wherein light-transmissible plate guiding means is provided to push the rear plate-support member of the light-transmissible plate so that the positioning protrusion abuts against the abutting member.

The Examiner erroneously alleges that Aikawa discloses the abutting member citing ref. # 7h in Fig. 8, and the light-transmissible plate guiding means citing ref. # 8a in Fig. 8. Contrary to the Examiner's allegation, the ref. # 7h in Fig. 8 marks a sealing rubber, while the ref. # 8a marks

a lifting table of a vertical transfer table 8. Moreover, even if, for the sake of arguments, the ref. # 7h of Aikawa were the abutting member, it still could not move toward and away from the positioning protrusion of the light-transmissible plate, as the alignment stage A of Aikawa (the load/unload position) lacks the transparent frame plate 7 as clearly shown in Fig. 3. As clearly illustrated in Figs. 3, 7 and 8, the transparent frame plate 7 is disposed in the exposing stage B independent of the transferring movable tables 12 and 13.

Regarding claim 11: in addition to the above arguments regarding the rejection of claim 1, Aikawa fails to disclose a first rotation center rod (6e1) connected to the first hoist rod (6f1) through a first link member (6c1) and being a rotation fulcrum at the time of elevating or lowering the first hoist rod (6f1) through the first link member (6c1), a second rotation center rod (6e2) connected to the second hoist rod (6f2) through a second link member (6c2) and being a rotation fulcrum at the time of lowering or elevating the second hoist rod (6f2) through the second link member (6c2), and link drive means (6a) for rotatably and synchronously moving the first and second link members (6c1 and 6c2) (illustrated in Fig. 9 of the present application).

The examiner erroneously alleges that Aikawa discloses all of the above elements and cites reference numerals 2a-f in Fig. 1. The Examiner misconstrued the present invention as the reference numerals 2a-f in Fig. 1 of Aikawa disclose: 2a - a mounting table; 2b - X-driving unit; 2c - Y-driving unit; 2d - a θ -driving unit; 2e - a cylinder driving device; 2f - a cylinder shaft. Clearly, the reference numerals 2a-f in Fig. 1 of Aikawa do not disclose none of the above elements recited in claim 11.

Regarding claim 12: Aikawa fails to disclose the step of conveying the first table and the second table **in an endless manner along a loop** (as illustrated in detail in Fig. 13), which

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extends across the first and second positions and includes the first and second transferring passages. By contrast, in the apparatus of Aikawa, the first movable table 12 and the second movable table 13 reciprocate along the linear guides 10a and 11a and the flat guides 10b and 11b (see column 10, lines 22-28 and 46-49). Therefore, the rejection of claim 12 under 35 U.S.C. 103(a) is improper.

The Examiner is advised that the US Patent No. 5,563,682 to Aikawa et al. cited by the Examiner appears to be a US equivalent of Japanese Laid-open Patent Application No. 8-43950 that is discussed in detail in the "BACKGROUND OF THE INVENTION" section of the present application with reference to FIG. 14.

New claims 17-20 have been added.

Therefore, it is respectfully submitted that claims 1-16 and new claims 17-20 define the invention over the prior art of record and are in condition for allowance, and notice to that effect is earnestly solicited. Should the Examiner believe further discussion regarding the above claim language would expedite prosecution they are invited to contact the undersigned at the number listed below.

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